

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,

Debtors.¹

)
) Chapter 11
)

) Case No. 22-10943 (MEW)

) (Jointly Administered)
)

**ORDER AUTHORIZING THE FILING OF THE OBJECTION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO PROOFS
OF CLAIM NOS. 11206, 11209, AND 11213 AND EXHIBITS IN SUPPORT
THEREOF UNDER SEAL AND GRANTING RELATED RELIEF**

Upon the *Ex Parte Motion of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Filing of the Objection of the Official Committee of Unsecured Creditors to Proofs of Claim Nos. 11206, 11209, and 11213 and Exhibits in Support Thereof Under Seal and Granting Related Relief* (the “Motion”);² and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and this Court having the power to enter a final order consistent with Article III of the United States Constitution; and venue being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and sufficient notice and opportunity for a hearing having been given; and no other or further notice being required; and the Court having reviewed the Motion; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.’s and Voyager Digital Ltd.’s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC’s principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

² Capitalized terms used but not defined herein shall have the same meanings ascribed to them in the Motion.

1. The Motion is GRANTED as set forth herein.
2. The Committee is authorized to file the Objection and the Exhibits under seal.
3. The Committee is authorized to provide unredacted copies of the Objection and the Exhibits to each of the Receiving Parties.
4. Neither the Objection, the Exhibits, nor any copies thereof shall be made available to any party that is not one of the Receiving Parties without the Committee's written consent or further order of the Court.
5. The Objection and the Exhibits shall remain under seal until the closing of the Debtors' cases, on which the Clerk's Office shall release any hard copies of or electronic storage device containing the Objection and the Exhibits to the Committee or, if it no longer exists, a party that the Committee designated before its existence ceased.
6. The Committee shall submit unredacted copies of the Objection and the Exhibits to the Clerk of this Court under seal in an envelope, clearly marked to indicate that the same has been filed under seal by order of this Court.
7. This Order is without prejudice to the rights of any party in interest, or the U.S. Trustee, to seek to unseal the Objection or the Exhibits.
8. Notwithstanding any procedural rule to the contrary, this order shall become effective immediately on its entry.
9. This Court retains jurisdiction of any matter arising from or relating to the implementation, interpretation, or enforcement of this Order.

Dated: February ___, 2023
New York, New York

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE